

The Honorable Richard A. Jones

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON; *et al.*,

NO. 2:20-cv-00111-RAJ

Plaintiffs,

STIPULATED MOTION TO
EXTEND ADMINISTRATIVE
RECORD DEADLINE
AND PROPOSED ORDER

v.

UNITED STATES DEPARTMENT OF
STATE; *et al.*,

NOTE ON MOTION CALENDAR:
JULY 22, 2020

Defendants.

I. STIPULATED MOTION

Pursuant to LCR 7(j) and 10(g), the Plaintiffs and the Federal Defendants submit this stipulated motion to modify the deadline for production of the administrative record (“AR”) in this matter. The Private Defendants do not oppose the relief requested in this motion.

The Court set forth the current deadline of July 24, 2020 on April 22, 2020 in an unnumbered scheduling order, “adopt[ing] the parties’ briefing schedule” as set forth in their joint status report. *See* Docket Text (Apr. 22, 2020); Joint Status Report, ECF No. 97 (Apr. 21, 2020). In the joint status report, the parties explained the July 24, 2020 deadlines as follows:

In light of disruption caused by the current COVID-19 crisis, the Federal Defendants are uncertain as to the precise date by which they can produce and

1 file the administrative record, and are currently working to provide an estimate.
 2 For present purposes, the parties have agreed that the administrative record will
 3 be produced by July 24, 2020, subject to an extension for good cause shown.

4 ECF No. 97 at 6. In the attached declarations of Joseph Khawam, Attorney-Adviser at the U.S.
 5 Department of State and Laura Nowell, Attorney in the Office of the General Counsel of the
 6 Department of Commerce, the Federal Defendants explain why there is good cause for the
 7 requested extension. These facts were shared with Plaintiffs prior to their agreement to join in
 8 this stipulated motion.

9 The States and the Federal Defendants agree that the requested extension of the
 10 production date in the AR to allow sufficient time for the Federal Defendants to complete that
 11 record is warranted, as production of a complete record will best secure the speedy, efficient,
 12 and inexpensive conduct of further proceedings in this matter. *See* Fed. R. Civ. P. 1. Because
 13 the Court's April 22, 2020 Order keys all other deadlines to the production of the AR, those
 14 deadlines will adjust automatically. The States and the Federal Defendants therefore request
 15 that the Court modify the deadline as follows:
 16

- 17 • The Administrative Record shall be produced by September 23, 2020.

18
 19 DATED this 22nd day of July, 2020.

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II. ORDER

Pursuant to the above stipulation, it is so ordered.

THE HONORABLE RICHARD A. JONES
UNITED STATES DISTRICT JUDGE